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12 *Attorneys for Defendant Sierra Cedars Condominium Homeowners Association*

13
14 **UNITED STATES DISTRICT COURT**
15
16 **DISTRICT OF NEVADA**

17 BANK OF AMERICA, N.A.,

18 Plaintiff,

19 v.

20 SIERRA CEDARS CONDOMINIUM
21 HOMEOWNERS ASSOCIATION; LVDG
22 SERIES 200, LLC; THUNDER
23 PROPERTIES, INC.; HAMPTON &
24 HAMPTON COLLECTIONS, LLC,

25 Defendants.

26 CASE NO.: 3:16-cv-00127-HDM-WGC

27 **STIPULATION AND ORDER TO
28 EXTEND TIME TO RESPOND TO BANK
OF AMERICA, N.A.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT [ECF
No. 55]**

(FOURTH REQUEST)

29 COME NOW Plaintiff, Bank of America, N.A., and Defendants, Thunder
30 Properties, Inc. and LVDG, LLC [Series 200]; Sierra Cedars Condominium
31 Homeowners Association; and Hampton & Hampton Collections, LLC, by and through
32 their undersigned counsel, hereby stipulate and agree as follows:

33 1. On March 21, 2018, Plaintiff filed a Motion for Partial Summary Judgment
34 [ECF No. 55].

35 2. On April 9, 2018, the parties submitted a stipulation extending the
36 deadline to respond to said Motion for Summary Judgment until April 25, 2018 [ECF No.
37 58]. Said stipulation was approved on April 10, 2018 [ECF No. 59].

1 3. On April 24, 2018, the parties submitted a second stipulation extending
2 the deadline to respond to said Motion for Summary Judgment until May 28, 2018 [ECF
3 No. 61]. Said Stipulation was approved on April 24, 2018 [ECF No. 62].

4 4. On May 30, 2018, the parties submitted a third stipulation to extend time
5 to respond to Bank of America, N.A.'s Motion for Partial Summary Judgment until June
6 12, 2018 [ECF No. 65]. Said Stipulation was approved on May 30, 2018 [ECF No. 66].

7 5. The parties have entered into settlement negotiations that are very close
8 to resolving this matter. The parties have exchanged joint settlement offers and there is
9 currently an offer that is pending recommended approval.

10 6. Based on the foregoing, Defendants have requested and shall be granted
11 an extension of time for two (2) weeks, until Tuesday, June 26, 2018, to respond to
12 Plaintiff's Motion for Partial Summary Judgment.

13 7. The parties certify that this Stipulation is made in good faith and the
14 extension is not sought for the purpose of undue delay or to cause prejudice to any
15 party.

16 DATED this 12th day of June, 2018

17 DATED this 12th day of June, 2018.

18 AKERMAN, LLP

19 LIPSON NEILSON P.C.

20 /s/ Vatana Lay

21 VATANA LAY ESQ.

22 Nevada Bar No. 12993

23 1635 Village Center Circle, Suite 200

24 Las Vegas, Nevada 89134

25 Attorneys for Plaintiff

26 Bank of America, N.A.

27 /s/ David A. Clark

28 DAVID A. CLARK

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30 9900 Covington Cross Drive, Suite 120

31 Las Vegas, Nevada 89144

32 Attorneys for Defendant

33 Sierra Cedars Condominium Homeowners
34 Association

1 DATED this 12th day of June, 2018

2 ROGER P. CROTEAU &
3 ASSOCIATES, LTD

4 /s/ Timothy E. Rhoda

5 TIMOTHY E. RHODA, ESQ.
6 Nevada Bar No. 7878
7 9120 West Post Road, Suite 100
8 Las Vegas, Nevada 89148
Attorneys for Defendant
Thunder Properties, Inc.
and LVDG, LLC [Series 200]

DATED this 12th day of June, 2018.

NEVADA ASSOCIATION SERVICES, INC.

/s/ Brandon E. Wood

BRANDON E. WOOD ESQ.
NEVADA No. 12900
6224 West Desert Inn Road
Las Vegas, Nevada 89146
Attorneys for Defendant
Hampton & Hampton Collections, LLC

10 Case No. 3:16-cv-00127-HDM-WGC

11 STIPULATION AND ORDER TO EXTEND TIME TO RESPOND
12 TO MOTION FOR PARTIAL SUMMARY JUDGMENT (Fourth Request)

13 IT IS SO ORDERED.

14 DATED: June 12, 2018

15 By: 

16 UNITED STATES DISTRICT COURT JUDGE

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